



Attachment A

Pursuant to 35 Ill. Adm. Code 725.174(a), all records, including plans, required under this Part must be furnished upon request and made available at all reasonable times for inspection by any officer, employee or representative of the Agency who is duly designated by the Director. You are in apparent violation of 35 Ill. Adm. Code 725.174(a) for the following reason: Failure to submit an updated closure plan as requested in a letter dated March 5, 1984.

Pursuant to 35 Ill. Adm. Code 725.212(a), by May 19, 1981, the owner or operator must have a written closure plan. A copy of the closure plan and all revisions must be kept at the facility until closure is completed and certified. The closure plan must include at least:

1. A description of how and when the facility will be partially closed, if applicable, and finally closed. The plan must identify how the requirements of Sections 725.211, 725.213, 725.214 and 725.215 and applicable requirements of 725.297, 725.328, 725.380, 725.410, 725.451, 725.481 and 725.504 will be met;
2. An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility;
3. A description of the steps needed to decontaminate facility equipment during closure;
4. An estimate of the expected year of closure and a schedule for final closure;
5. A provision for closure certification by an independent registered professional engineer.

You are in apparent violation of 35 Ill. Adm. Code 725.212(a) for the following reason(s): Failure to submit a closure plan that meets all of the above requirements.

Pursuant to 35 Ill. Adm. Code 725.242(a), the owner or operator must prepare a written estimate, in current dollars, of the cost of closing the facility in accordance with the closure plan as specified in Section 725.212. You have failed to provide a closure cost estimate as required. The closure cost estimate must equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan. You are in apparent violation of 35 Ill. Adm. Code 725.242(a) for the following reason(s): Failure to submit a closure cost estimate with a step by step cost breakdown as indicated by its closure plan.



Page 2

Pursuant to 40 CFR 265.143 (as incorporated by reference in 35 Ill. Adm. Code 725.243), an owner or operator of each facility must establish financial assurance for closure of the facility. You have failed to provide adequate documentation demonstrating compliance with this section. You are in apparent violation of 35 Ill. Adm. Code 725.243 for the following reason(s): Failure to submit an updated Financial Test for 1984. The State of Illinois forms are enclosed.

Pursuant to 40 CFR 265.147(a) (as incorporated by reference in 35 Ill. Adm. Code 725.245), the owner or operator of a hazardous waste treatment, storage or disposal facility must demonstrate financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the facility or group of facilities. The owner or operator must have and maintain liability coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs. You are in apparent violation of 35 Ill. Adm. Code 725.245 for the following reason(s): The insurance policy submitted for sudden accidental occurrences fails to use the required exact wording as on the Illinois standardized EPA forms. The State of Illinois forms are enclosed for your resubmission.

MT:ct/1614E,41-42

INA

DATE 7/30/85

CANCELLATION NOTICE

CERTIFICATE HOLDER:

Mr. Valdas V. Adamkus
Regional Administrator, USEPA
230 S. Dearborn Street
Chicago, Illinois 60604

RECEIVED

AUG 14 1985

SWB:TS
U.S. EPA. REGION V

Insured(s): ^eITT Happer Division
EPA No. # ILD00521154 5

Policy Number(s): SCG-GO-134004-9

Cancelled
Effective: November 7, 1983

RECEIVED

AUG 14 1985

SOLID WASTE DIVISION
U.S. EPA, REGION V

In accordance with the provisions of the Certificate of Insurance issued to you, notification of cancellation is hereby given for the above policy or policies.

Very truly yours,

Edward M. Fadden

Edward McFadden
Account Representative

ITT Harper
160 OUT-11545 FJ

McDERMOTT, WILL & EMERY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

111 WEST MONROE STREET

CHICAGO, ILLINOIS 60603

312/372-2000

TELECOPIER 312/372-2022

TELEX 25-3585, 210079

CABLE MILAM

ONE POST OFFICE SQUARE
BOSTON, MASSACHUSETTS 02109
617/357-0200

700 BRICKELL AVENUE
MIAMI, FLORIDA 33131
305/358-3500

FIRST NATIONAL BANK BUILDING
SPRINGFIELD, ILLINOIS 62701
217/522-7200

2540 EXECUTIVE CENTER CIRCLE, WEST
TALLAHASSEE, FLORIDA 32301
904/856-1791

1850 K STREET, N. W.
WASHINGTON, D. C. 20006
202/887-8000

ASSOCIATED OFFICE
QIAN MEN HOTEL - 517
BEIJING, PEOPLE'S REPUBLIC OF CHINA
332077 TELEX 22523

January 24, 1986

LOUIS M. RUNDIO, JR.
312/984-7710

Mr. Andrew A. Vollmer
Financial Assurance
Permit Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

RECEIVED
JAN 27 1986
IEPA-DLPC

Dear Mr. Vollmer:

On behalf of ITT Harper, I am responding to Illinois EPA's inquiries about compliance with closure plan and financial responsibility requirements for the company's Morton Grove, Illinois facility. Illinois EPA has indicated that the company does not have a closure plan on file and has not demonstrated the necessary financial responsibility for operating a hazardous waste treatment and storage facility.

I believe that Illinois EPA maintains a file on each interim status or Part B facility where copies of closure plans and financial responsibility documents are kept. My understanding is that Illinois EPA's recent inquiries were made because a review of the Morton Grove facility's file did not reveal a closure plan or financial responsibility documents.

The explanation is simply that ITT Harper's authorized interim status TSD facility in Morton Grove was closed. Closure took place in two steps: in 1981 when the non-contact cooling water pond was closed, and in early 1983 when all other interim status activities ceased in connection with discontinuing manufacturing operations at the facility. This letter contains a chronology of the plant's short history as an interim status treatment and storage facility. The chronology is keyed to relevant documents, copies of which are enclosed.

Mr. Andrew A. Vollmer
Page 2

As you can see from the dates, some closure activities occurred before Illinois had RCRA authority, and the rest occurred when Illinois was obtaining such authority, a time of great confusion at best. In view of this, the company understands how Illinois EPA could have the Morton Grove facility incorrectly listed as an active interim status facility. To help clear the matter up, the chronology is detailed and the documents are extensive.

I trust the information supplied with this communication will allow Illinois EPA to update its file for the Morton Grove facility to reflect its closure as an interim status facility. If there are any questions or if you need additional information, please let me know.

CHRONOLOGY

1. November, 1980--The Part A application is filed, thereby qualifying the Morton Grove facility as an interim status treatment and storage facility. Note that a surface impoundment is listed in the original part A. This listing is a protective filing because pond usage was limited to recirculated non-contact cooling water. See Exhibit A.

2. May, 1981--ITT Harper contacts U.S. EPA, Region V, regarding closing the surface impoundment and replacing it with cooling towers. The company revises its Part A eliminating the surface impoundment and submits a surface impoundment closure plan. See Exhibit B.

3. June, 1981--ITT Harper contacts U.S. EPA, Region V, regarding Part A revisions and surface impoundment closure plan revisions. See Exhibit C.

4. November, 1981--ITT Harper contacts U.S. EPA, Region V, regarding U.S. EPA's waiver of groundwater monitoring requirements for the surface impoundment based on closure by the end of 1981. The letter also presents a revised closure schedule. See Exhibit D.

5. December, 1981--ITT Harper forwards to U.S. EPA, Region V, the inspection report and professional engineer's certification for the surface impoundment closure. See Exhibits E and F.

Mr. Andrew A. Vollmer
Page 3

6. January, 1982--U.S. EPA, Region V, approves the surface impoundment closure plan, affirms its waiver of groundwater monitoring requirements, and states it considers the surface impoundment closed in accordance with 40 CFR 265. See Exhibit G.

7. November, 1982--ITT Harper sends to Illinois EPA copies of the closure plan and closure cost estimate for the remaining treatment and storage facility and informs Illinois EPA of the company's intent to immediately implement the closure plan. See Exhibit H.

8. November, 1982--ITT Harper contacts the U.S. EPA, Region V, regarding the closure plan for the remaining treatment and storage facility and its intention to implement the closure plan immediately. See Exhibit I.

9. February, 1983--Illinois EPA sends questions to the company regarding the closure plan. See Exhibit J.

10. March, 1983--ITT Harper responds to Illinois EPA's questions regarding the closure plan by providing a detailed explanation of the closure of the remaining portion of the treatment and storage facility at the Morton Grove plant. Included in this communication are all details of how the facility was closed, a summary of the work of the consultant retained in connection with the closure, a complete description of closure activities, a statement of the amount of waste at the facility at the time of closure, and evidence of removal of all hazardous wastes at the facility at the time of closure. See Exhibit K and attachments thereto.

Very truly yours,


Louis M. Rundio, Jr.

LMR/lw
enclosures

McDERMOTT, WILL & EMERY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

111 WEST MONROE STREET

CHICAGO, ILLINOIS 60603-4067

312/372-2000

TELECOPIER 312/372-2028

TELEX 25-3565, 210079

CABLE MILAM

ONE POST OFFICE SQUARE
BOSTON, MASSACHUSETTS 02109
617/357-0200

700 BRICKELL AVENUE
MIAMI, FLORIDA 33131
305/358-3500

FIRST NATIONAL BANK BUILDING
SPRINGFIELD, ILLINOIS 62701
217/522-7200

107 NORTH MONROE STREET
TALLAHASSEE, FLORIDA 32301
904/222-2312

1850 K STREET, N. W.
WASHINGTON, D. C. 20006
202/887-8000

ASSOCIATED OFFICE
QIAN MEN HOTEL - 517
BEIJING, PEOPLE'S REPUBLIC OF CHINA
332077 TELEX 22523

November 25, 1986

LOUIS M. RUNDIO, JR.
312/984-7710

Mr. Harry Chappel
Illinois Environmental Protection
Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

Dear Mr. Chappel:

In response to the IEPA's request for certification that the ITT Harper facility in Morton Grove, Illinois was closed in accordance with the closure plan for it, I am transmitting a copy of the December 23, 1981 letter forwarding a December 22, 1981 certification of Dames & Moore. I trust that this certification is sufficient to close IEPA's file on the decommissioning of the ITT Harper, Morton Grove hazardous waste facility.

Very truly yours,

Louis M. Rundio, Jr.
Louis M. Rundio, Jr.

LMR/dlh
enc.
cc: Andrew Vollmer

RECEIVED
DEC - 1 1986
PA-DLPC



217/782-6761

Refer to: 631150005 -- Cook County
Morton Grove/ITT Harper
ILDC05211545
Compliance File

April 29, 1987

ITT
Attention: Mr. Woodward
Harper Division
320 Park Avenue
New York, New York 10022

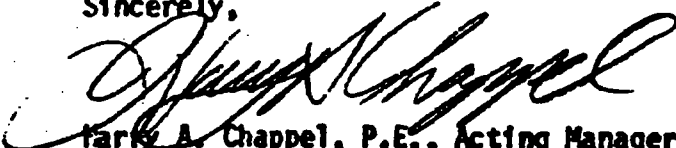
Dear Mr. Woodward:

The Agency is in receipt of your January 24, 1986 response(s) to our January 10, 1986 Pre-Enforcement Conference Letter. Your response(s) has been reviewed and the apparent violation(s) of Section(s) 725.174(a), 725.212(a), 725.242(a) are now considered resolved.

The violations of 725.243 and 725.247 remain unresolved.

If you have any questions, please contact me at 217/782-6762.

Sincerely,


Barry A. Chappel, P.E., Acting Manager
Facilities Compliance Unit
Compliance Monitoring Section
Division of Land Pollution Control

HAC:sf/2352g,24

cc: Division File ✓
Northern Region
D. Gimbel
H. Tebrugge
Louis H. Rundio, Jr.



217/782-6763

Refer to: IL11950005 -- Cook County
Horton Grove/ITT Harper
ILD005211545
Compliance File

COMPLIANCE INQUIRY LETTER

April 30, 1987

CERTIFIED # _____

ITT
Attn: Mr. Woodward
Harper Division
320 Park Avenue
New York, NY 10022

Dear Mr. Woodward:

The purpose of this letter is to address the status of the above referenced facility in relation to the requirements of 35 Ill. Adm. Code, Part 725 and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations. The Agency's findings of apparent non-compliance listed in Attachment A are based on a review of documents submitted to the Agency to demonstrate compliance with the requirements of 35 Ill. Adm. Code, Part 725, Subpart G.

Please submit for approval within fifteen (15) calendar days of the date of this letter your closure certification (this certification of closure must be made by the owner/operator and an independent registered engineer). This document should be sent to the following:

Harry A. Chappel, P.E., Manager
Compliance Section
Illinois Environmental Protection Agency
Division of Land Pollution Control (#24)
2200 Churchill Road
P. O. Box 19276
Springfield, IL 62794-9276

AND

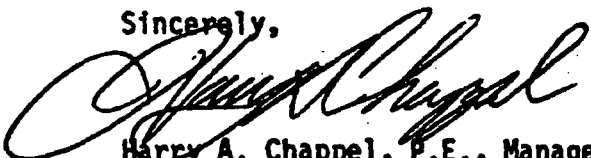
Lawrence W. Eastep, P.E., Manager
Permit Section
Illinois Environmental Protection Agency
Division of Land Pollution Control (#24)
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

Until your facility is formally closed, you remain subject to all applicable requirements of 35 Ill. Adm. Code, Part 725, Subpart H.

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111½, Sec. 1001 et seq or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C., Sec. 6901 et seq.

If you have any questions regarding the above, please contact me at 217/782-6761.

Sincerely,



Harry A. Chappel, P.E., Manager
Compliance Section
Division of Land Pollution Control

HAC:tk:2/14/17

Attachment

cc: Division File
Northern Region
Louis M. Rundio, Jr.
Andy Vollmer ✓

ATTACHMENT A

Pursuant to 35 Ill. Adm. Code 725.215, when closure is completed, the owner or operator must submit to the Director certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. You are in apparent violation of this section for the following reason(s):

You have failed to submit certification of closure 30 days after the final closure date indicated in your approved closure plan for the storage and treatment units located at this facility.

HAC:tk:2/14/18(4/30/87)

Log-855 Closure

RESPONSE TO 4/30/87 CIL

McDERMOTT, WILL & EMERY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

111 WEST MONROE STREET

CHICAGO, ILLINOIS 60603-4067

312/372-2000

TELECOPIER 312/984-7700

TELEX 25-3565, 210079

CABLE MILAM

ONE POST OFFICE SQUARE
BOSTON, MASSACHUSETTS 02109
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700 BRICKELL AVENUE
MIAMI, FLORIDA 33131
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TALLAHASSEE, FLORIDA 32301
904/222-2312

1850 K STREET, N. W.
WASHINGTON, D. C. 20006
202/887-8000

LOUIS M. RUNDIO, JR.
312/984-7710

May 11, 1987

Mr. Harry A. Chappel, P.E., Manager
Compliance Section
Illinois Environmental Protection Agency
Division of Land Pollution Control (#24)
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276

Re: 0311950005 -- Cook County
Morton Grove/ITT Harger
ILD005211545
Compliance File

Dear Mr. Chappel:

Enclosed please find two certificates relating to closure of hazardous waste treatment and storage facilities at the ITT/Harper facility in Morton Grove, Illinois. One certificate is from Dames & Moore, the independent registered engineer which oversaw the closure. The other certificate is from the company engineer in charge of the project.

I trust these certificates resolve all outstanding matters with regard to Mr. Vollmer's review of the file.

Very truly yours,

Louis M. Rundio, Jr.
Louis M. Rundio, Jr.

LMR/aml
enclosures

cc: Lawrence W. Eastep, P.E.
Andrew Vollmer

RECEIVED

MAY 13 1987

RECEIVED

MAY 18 1987

IEPA-DLPC

IEPA-DLPC



Fluid Handling Division
ITT Corporation


McDonnell & Miller

3500 N. Spaulding Ave.
Chicago, Illinois 60618
(312) 267-1600
Telex 25-3376

CERTIFICATION

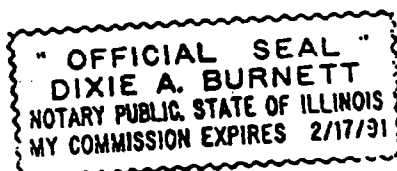
I have been asked to supply my certification regarding the closure of the ITT Harper facility in Morton Grove, Illinois where I was once employed as Plant Engineer. Although my employment with ITT Harper ceased on January 14, 1983, the bulk of the hazardous waste closure activities had been completed at that time, under my supervision. Based upon my recent review of the pertinent documents, I can make the following statement.

To the best of my knowledge, the hazardous waste closure activities occurring during my employment with ITT Harper in Morton Grove, Illinois were performed in good faith, in accordance with the submitted closure plans, and in compliance with applicable state and federal regulations. Based upon my review of documents describing the closure activities after my departure on January 14, 1983, it is my opinion that the closure of the hazardous waste facilities was satisfactorily completed in full compliance with the law.


Timothy S. Milo - E.I.T.
Product Engineer
ITT McDonnell & Miller

Subscribed and sworn to
before me this 14th
day of April, 1987.


(NOTARY PUBLIC)



Dames & Moore

1550 Northwest Highway
Park Ridge, Illinois 60068
(312) 297-6120

April 13, 1987

ITT Harper
3500 North Spaulding Avenue
Chicago, IL 60618

Attention: Mr. Tim Milo

Re: Closure Inspection and Certification for Hazardous
Waste Equipment at ITT Harper Facility

Gentlemen:

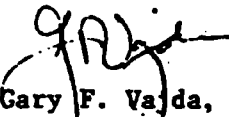
We have been asked to supply our certification regarding the closure of the ITT Harper facility in Morton Grove, Illinois between December 1982 and February 1983. None of the Dames & Moore professionals involved with the closure are currently with the firm. However, I have reviewed our documents and records, and, based on my review, I can supply the following statement of Dames & Moore's activities and our certification.

Between December 1982 and February 1983, Dames & Moore observed and inspected closure activities at the ITT Harper facility at 8200 Lehigh Avenue, Morton Grove, Illinois 60053. We conferred with facility personnel regarding closure activities and observed and inspected closure operations for compliance with the Closure Plan. We prepared site reports of our inspections and observations and have reviewed the hazardous waste manifest forms for shipping hazardous waste from the facility.

In our opinion, closure of the hazardous waste equipment at the plant was performed in accordance with the Closure Plan and in accordance with federal and state regulations regarding hazardous waste.

Very truly yours,

DAMES & MOORE
A Professional Limited Partnership


Gary F. Vajda, P.E.
IL License No. 062-040075
Associate

GFV:gf

cc: Mr. Louis M. Rundio, Jr.
McDermott, Will & Emery
111 West Monroe
Chicago, IL 60603



217/782-6761

Refer to: 0311950005 - Cook County
Morton Grove/ITT Harper
ILD005211545
Compliance File

PRE-ENFORCEMENT CONFERENCE LETTER

Certified # *P594561709*

July 14, 1987

ITT - Harper Division
Attn: Mr. Woodward
320 Park Avenue
New York, NY 10022

Dear Mr. Woodward:

The Agency has previously informed ITT Harper of apparent violations of the Illinois Environmental Protection Act and/or rules and regulations adopted thereunder. These apparent violations are set forth in Attachment A of this letter.

As a result of these apparent violations, it is our intent to refer this matter to the Agency's legal staff for the preparation of a formal enforcement case. The Agency's legal staff will, in turn, refer this matter to the Office of Attorney General or to the United States Environmental Protection Agency for the filing of a formal complaint.

Prior to taking such action, however, you are requested to attend a Pre-Enforcement Conference to be held at the Division of Land Pollution Control, 2200 Churchill Road, Springfield, Illinois 62794-9276. The purpose of this Conference will be:

1. To discuss the validity of the apparent violations noted by Agency staff, and
2. To arrive at a program to eliminate existing and/or future violations.

You should, therefore, bring such personnel and records to the conference as will enable a complete discussion of the above items. We have scheduled the Conference for July 27, 1987 at 10:00 a.m. If this arrangement is inconvenient, please contact Michelle Tebrugge at 217/782-4462 to arrange for an alternative date and time.



Attachment A

Pursuant to 35 Ill. Adm. Code 725.215, when closure is completed, the owner or operator must submit to the Director certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. You are in apparent violation of this section for the following reasons:

You have failed to submit a proper certification of closure 30 days after the final closure date indicated in your approved closure plan for the storage and treatment units located at this facility. The following problems were found with your May 11, 1987 certifications:

- A. Both certifications were copies. Original signatures are required.
- B. Information was not provided to demonstrate that Mr. Milo is an authorized representative of the owner and operator.

Attached is a copy of the closure certification which the Agency requires to be signed by the owner and operator and the independent engineer.

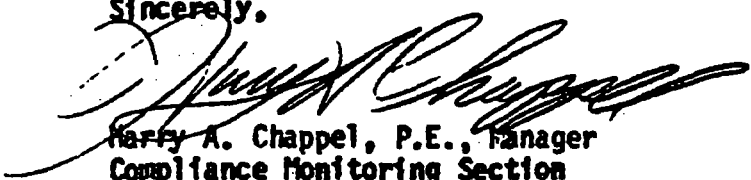
HAC:NT:st:3064g,65



Page 2

In addition, please be advised that this letter constitutes the notice required by Section 31(d) of the Illinois Environmental Protection Act prior to the filing of a formal complaint. The cited Section of the Illinois Environmental Protection Act requires the Agency to inform you of the charges which are to be alleged and offer you the opportunity to meet with appropriate officials within thirty days of this notice date in an effort to resolve such conflict which could lead to the filing of formal action.

Sincerely,


Harry A. Chappel, P.E., Manager
Compliance Monitoring Section
Division of Land Pollution Control

HAC:MT:st:3064g,63-64

Attachment

cc: Division File ✓
Northern Region
Paul Jagiello
Don Gimbel
Charlie Zeal
Michelle Tebrugge

Enclosure 855

McDERMOTT, WILL & EMERY
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

111 WEST MONROE STREET

CHICAGO, ILLINOIS 60603-4087

312/372-2000

FACSIMILE 312/884-7700

TELEX 25-3565, 210079

CABLE MILAM

ONE POST OFFICE SQUARE
BOSTON, MASSACHUSETTS 02109
617/357-0200

2049 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067
213/277-4110

700 BRICKELL AVENUE
MIAMI, FLORIDA 33131
305/358-3500

FIRST NATIONAL BANK BUILDING
SPRINGFIELD, ILLINOIS 62701
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101 NORTH MONROE STREET
TALLAHASSEE, FLORIDA 32301
904/222-2312

1850 K STREET, N. W.
WASHINGTON, D. C. 20006
202/887-8000

December 1, 1987

LOUIS M. RUNDIO, JR.
312/884-7710

Mr. Harry A. Chappel, P.E., Manager
Compliance Section
Illinois Environmental Protection Agency
Division of Land Pollution Control (#24)
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276

Dear Mr. Chappel:

Enclosed please find three executed copies of certificates of closure from both ITT Corporation and Dames & Moore regarding the closure of ITT Harper's facility in Morton Grove, Illinois. The certifications meet the requirements of the applicable Illinois regulations and I trust that the agency's receipt of these certifications will close the matter.

Very truly yours,

Louis M. Rundio, Jr.

Louis M. Rundio, Jr.

LMR/aml
cc: Paul Jagiello

RECEIVED
DEC - 2 1987
10:10:50

CLOSURE CERTIFICATION STATEMENT

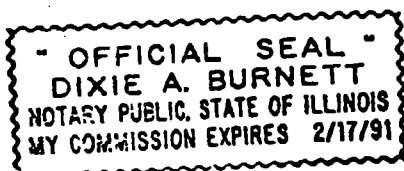
I have been asked to supply my certification regarding the closure of the ITT Harper facility in Morton Grove, Illinois where I was once employed as Plant Engineer. Although my employment with ITT Harper ceased on January 14, 1983, the bulk of the hazardous waste closure activities had been completed at that time, under my supervision. Based upon my recent review of the pertinent documents, I can make the following statement:

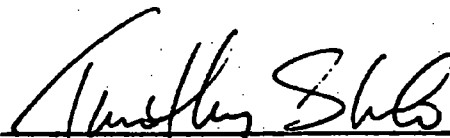
To the best of my knowledge, the hazardous waste closure activities occurring during my employment with ITT Harper in Morton Grove, Illinois were performed in good faith, in accordance with the submitted closure plans, and in compliance with applicable state and Federal regulations. Based upon my review of the documents describing the various closure activities which occurred after my departure on January 14, 1983, it is my opinion that the closure of the hazardous waste facilities was satisfactorily completed in full compliance with the law.

The hazardous waste management units at the ITT Harper facility at 8200 Lehigh Avenue, Morton Grove, Illinois 60053 have been closed in accordance with the specifications in the approved closure plan. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

ITT Harper Facility
8200 Lehigh Avenue
Morton Grove, Illinois 60053

U.S. EPA I.D. Number
ILD005211545




Timothy S. Milo -- E.I.T.
Product Engineer
ITT McDonnell & Miller

November 20, 1987

Signed and sworn to before me
this 20 day of NOVEMBER, 1987



RECEIVED
DEC - 3 1987
EPA/OLFC

CLOSURE CERTIFICATION STATEMENT

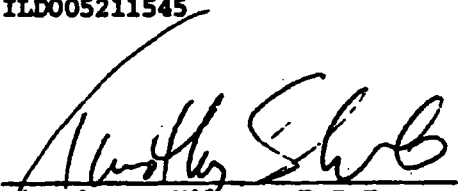
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The hazardous waste management units at the ITT Harper facility at 8200 Lehigh Avenue, Morton Grove, Illinois 60053 have been closed in accordance with the specifications in the approved closure plan. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

ITT Harper Facility
8200 Lehigh Avenue
Morton Grove, Illinois 60053

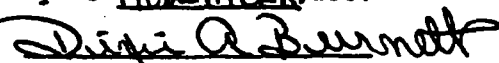
U.S. EPA I.D. Number
ILD005211545


Timothy S. Milo -- E.I.T.
Product Engineer
ITT McDonnell & Miller

" OFFICIAL SEAL "
DIXIE A. BURNETT
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 2/17/91

November 20, 1987

Signed and sworn to before me
this 20 day of NOVEMBER, 1987



RECEIVED
DEC - 3 1987
IEPA/DLFC

CLOSURE CERTIFICATION

We have been asked to supply our certification regarding the closure of the ITT Harper facility in Morton Grove, Illinois between December 1982 and February 1983. None of the Dames & Moore professionals involved with the closure are currently with the firm. However, I have reviewed our documents and records, and, based on my review, I can supply the following statement of Dames & Moore's activities and our certification.

Between December 1982 and February 1983, Dames & Moore observed and inspected closure activities at the ITT Harper facility at 8200 Lehigh Avenue, Morton Grove, Illinois 60053. We conferred with facility personnel regarding closure activities and observed and inspected closure operations for compliance with the Closure Plan. We prepared site reports of our inspections and observations and have reviewed the hazardous waste manifest forms for shipping hazardous waste from the facility.

In our opinion, closure of the hazardous waste equipment at the plant was performed in accordance with the Closure Plan and in accordance with federal and state regulations regarding hazardous waste. Based on the foregoing,

RECEIVED

DEC - 3 1987

IEPA/DLFC

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In our opinion, closure of the hazardous waste equipment at the plant was performed in accordance with the Closure Plan and in accordance with federal and state regulations regarding hazardous waste. Based on the foregoing,

we hereby submit the following Closure Certification Statement.

CLOSURE CERTIFICATION STATEMENT

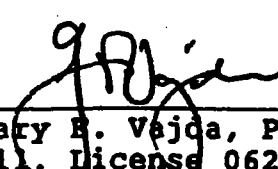
The hazardous waste management units at the ITT Harper facility at 8200 Lehigh Avenue, Morton Grove, Illinois 60053 have been closed in accordance with the specifications in the approved closure plan. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

ITT Harper Facility
8200 Lehigh Avenue
Morton Grove, Illinois 60053

U.S. EPA ID Number
. ILD005211545

Dames & Moore
A Professional Limited Partnership

October 23, 1987



Gary E. Vajda, P.E.
Ill. License 062-040075
Associate

we hereby submit the following Closure Certification Statement.

CLOSURE CERTIFICATION STATEMENT


The hazardous waste management units at the ITT Harper facility at 8200 Lehigh Avenue, Morton Grove, Illinois 60053 have been closed in accordance with the specifications in the approved closure plan. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

ITT Harper Facility
8200 Lehigh Avenue
Morton Grove, Illinois 60053

U.S. EPA ID Number
ILD005211545

Dames & Moore
A Professional Limited Partnership

October 23, 1987



Gary E. Vajda, P.E.
Ill. License 062-040075
Associate

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345154 783

file



Illinois Environmental Protection Agency

2200 Churchill Road. Springfield, IL 62706

217/782-6762

Refer to: 0311950005 -- Cook County
ITT Harper Corporation
ILD005211545
RCRA-Closure

Log #C-855

March 15, 1988

Mr. Milo -- E.I.T.
ITT Corporation
8200 Lehigh Avenue
Morton Grove, Illinois 60053

Dear Mr. Milo:

The subject hazardous waste management facility was inspected by a representative of this Agency on February 16, 1988. The inspection revealed that the closure activity was completed in accordance with the approved closure plan dated November 18, 1982.

Certification that the ITT Harper Corporation plant had been closed in accordance with the approved closure plan by the owner/operator, yourself, and an independent registered professional engineer, Gary E. Vajda, P.E., of Illinois was received at this Agency December 3, 1987.

The Agency has determined that the closure of the ITT Harper Corporation plant has apparently met the requirements of Interim Status Standards, 35 Ill. Admin. Code, Part 725 (40 CFR, Part 265). Please note, the Agency has withdrawn your Part A dated November 17, 1980 to reflect the status change due to completed closure activities.

If you have any questions, please contact Karen Nachtwey at 217/782-0892.

Very truly yours,

Lawrence W. Eastep

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:KN:rd0751j/5

cc: Northern Region
USEPA Region V, Mary Murphy
USEPA Region V, Art Kawatachi
Gary E. Vajda, P.E.
Division File
Andy Vollmer
Compliance Section



217/762-6761

Refer to: C311950005 -- Cook County
Horton Grove/ITT Harper
ILD005211545
Compliance File

March 28, 1988

ITT Harper
Attn: Mr. Woodward
Harper Division
320 Park Avenue
New York, NY 10022

Dear Mr. Woodward:

The Agency is in receipt of your Closure Certification Statement. A Closure Verification Inspection was conducted on February 16, 1988, and a Closure Certification Approval Letter was issued on March 15, 1988. As a result of successful closure the apparent violation(s) of 35 Ill. Adm. Code Section(s) 725.243, 725.245 and 725.215 cited in our January 10, 1986 Pre-Enforcement Conference Letter and July 14, 1987 Pre-Enforcement Conference Letter are now considered resolved.

If you have any questions regarding the above matter, please contact Andrew Vollmer or Harry Chappel at 217/782-6761.

Sincerely,

(Signature)
Angela Aye Tin, Manager
Technical Compliance Unit
Compliance Section
Division of Land Pollution Control

AAT:AV:HC:tf/0922j,13

cc: Division File
Haywood Region
Andrew Vollmer ✓
Harry Chappel
Brian White



Illinois Environmental Protection Agency

2200 Churchill Road, Springfield, IL 62706

P-486 652 502

217/782-6761

Refer to: 0311950005 -- Cook County
ITT Harper
ILD005211545
RCRA - Permits

Attn: Environmental Coordinator
or Plant Manager

May 6, 1988

ITT Harper
8200 Lehigh Ave.
Morton Grove, IL 60053

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart D. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For your convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.



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In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the registered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to \$25,000 per day of noncompliance.



Page 3

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9875.

Very truly yours,

A handwritten signature in cursive script that reads "Lawrence W. Eastep".

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JKM:mab/1203j/1204j/

Enclosures

cc: Division File
Compliance
Maywood Region
USPEA Region V